



**February 7, 2019**

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**Via ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, S.W., Suite TW-A325  
Washington, DC 20554

Re: Siskiyu Long Distance  
CPNI Certification and Accompanying Statement  
EB Docket No. 06-36

Dear Ms. Dortch:

Siskiyu Long Distance, by its attorneys and pursuant to Section 64.2009(e) of the Commission's Rules, hereby submits its annual Customer Proprietary Network Information (CPNI) certification and accompanying statement.

Should you have any questions or need further information, please contact the undersigned.

Sincerely,

**Womble Bond Dickinson (US) LLP**

/s/

Marjorie Spivak  
Partner

Attachments



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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2018

Date filed: 1-04-19

Name of company(s) covered by this certification: Siskiyou Long Distance

Form 499 Filer ID: 821152

Name of signatory: James T. Lowers

Title of signatory: Vice President

I, James T. Lowers, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

If affirmative: Not applicable.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

If affirmative: Not applicable.

*James T. Lowers*

Signed \_\_\_\_\_



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### CPNI Usage Policy Statement

Pursuant to Section 64.2009(e) of the Federal Communications Commission's ("FCC") rules, this statement explains how the operating procedures of Siskiyou Long Distance ensure compliance with Part 64, Subpart U of the FCC's rules.

1. The Company has chosen to prohibit the use of CPNI for marketing purposes by itself and between its affiliates.
2. The Company's CPNI Policy Manual includes an explanation of what CPNI is and when it may be used without customer approval.
3. Employees with access to CPNI have been trained as to when they are and are not authorized to use CPNI. The Company's CPNI Policy Manual describes the disciplinary process related to noncompliance with CPNI obligations, and sets forth the penalties for non-compliance, which can include termination of employment.
4. The Company has established a supervisory review process regarding Company compliance with the FCC's CPNI rules.
5. The Company requires affirmative written/electronic subscriber approval for the release of CPNI to third parties.
6. A Corporate Officer has been named as the CPNI Compliance Officer and is held responsible for annually certifying that the Company is in compliance with the FCC's CPNI rules and submitting to the FCC, on or prior to March 1<sup>st</sup> of each year, the certification and an accompanying statement explaining how the Company complies with the FCC's CPNI rules.
7. The Company takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. The Company has safeguards in place to protect against unauthorized access to CPNI. The Company authenticates a customer prior to disclosing CPNI based on customer initiated telephone contact or an in-store visit.
8. The Company password-protects online access to all CPNI, call detail and non-call detail.
9. The Company does not disclose call detail information over the telephone, based on customer-initiated telephone contact. The Company only discloses call detail information by sending it to the address of record or by calling the customer at the telephone number of record. If the customer is able to provide call detail information during a customer-initiated call without Company's assistance, then the Company is permitted to discuss the call detail information provided by the customer.



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10. The Company provides customers with access to CPNI at a Company retail location if the customer presents a valid photo ID and the valid photo ID matches the name on the account.
11. The Company has procedures and policies in place to notify a customer immediately when an address of record is created or changed.
12. In the event of a CPNI breach, the Company complies with the FCC's rules regarding notice to law enforcement and customers. The Company maintains records of any discovered breaches and notifications to the United States Secret Service (USSS) and the FBI regarding those breaches, as well as the USSS and the FBI responses to the notifications for a period of at least two years.
13. The Company did not take action against data brokers or receive any customer complaints during the previous calendar year (or in the current year as of the date of this filing) concerning the unauthorized release of CPNI.